

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA
GARRETT, ROBERT NIXON,
SAMANTHA NIXON, DAVID
BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN,
ROGELIO VARGAS, MARILYN DEWEY,
PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

**STIPULATION BETWEEN PLAINTIFFS
AND DEFENDANT HAPPY HOUR MEDIA
GROUP, LLC
AND
[PROPOSED] ORDER AMENDING
DEFENDANT HAPPY HOUR'S DEADLINE
TO RESPOND TO COMPLAINT AND
RELATED BRIEFING SCHEDULES**

Noted: August 9, 2023.

1 WHEREAS, the Court entered a stipulated Order Regarding Deadlines to Respond to
2 Complaint and Related Briefing Schedules on July 6, 2023 (Dkt. 17), which set August 10, 2023,
3 as the deadline for motions to dismiss,

4 WHEREAS, counsel for the Plaintiffs and counsel for Defendant Happy Hour Media
5 Group, LLC (“Happy Hour”) have had several discussions about the possibility of resolving this
6 lawsuit with respect to Happy Hour, a settlement proposal has been made, each plaintiff, Happy
7 Hour, and the relevant insurer are aware of and contributing to the settlement discussions,

9 WHEREAS, Plaintiffs’ counsel at Albert Law, PLLC, and defense counsel at Corr Cronin,
10 LLP, have settled at least a dozen cases in which they represented adversaries during the past 3
11 years,

12 WHEREAS, Plaintiffs and Happy Hour believe it would be productive to allow settlement
13 discussions to continue without a motion to dismiss from Happy Hour pending.

15 THEREFORE, in the interest of efficiency and of encouraging settlement discussions,
16 Plaintiffs and Happy Hour have agreed to the following deadlines and ask that the Court enter an
17 Order adopting them:

18	Date by which any motion to dismiss by Happy Hour	
19	will be due:	October 5, 2023
20	Date by which any opposition will be due:	November 2, 2023
21	Date on which any motion will be noted and reply	
22	brief will be due:	November 10, 2023

23
24 STIPULATED TO this 9th day of August, 2023.

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Attorney for Defendant Happy Hour Media Group, LLC

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2023.

The Honorable James L. Robart
United States District Judge